

March 16, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
MM Docket Nos. 00-168, 04-296

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission Rules, this notice of an ex parte communication in the above-referenced proceeding is being provided. On March 15, 2012, Mark Allen, Esq., President/CEO of Washington State Association of Broadcasters ("WSAB"); Jon Rand, Vice President/COO of Northwest Broadcasting, Inc.; Larry Miner, Director of Sales with Bicoastal Media, LLC; Patrick Costello, Vice President/Station Manager of KING-TV/KONG TV; Larry Forsgren, General Manager of KNDO-TV/KNDU-TV; and the undersigned counsel for the WSAB, met with Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Mignon L. Clyburn. The representatives of the WSAB discussed the prospect of requiring television stations to maintain an online public inspection file, and the use of text-to-speech technology for Emergency Alert System ("EAS"), as detailed further below.

First, with respect to the online public inspection file, the representatives of the WSAB urged the Commission to consider the real world impact of the proposed rule change, and spoke to the potential costs and burden on television stations if the public file, including the political file, was required to be maintained online. The representatives questioned the basis for, and benefit to be gained from, changing the public inspection file from a local resource available to a station's local community to one available nationally. The parties also discussed the potential competitive impact if advertising rate information from the political file was made publicly available online to competitors and advertisers both in the market and across the nation.

Second, the representatives of the WSAB discussed the Commission's recent Fifth Report and Order In the Matter of Review of the Emergency Alert System, 27 FCC Rcd 642 (Jan. 20, 2012). In particular, the WSAB addressed the Commission's decision in that Order

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to depart from the EAS-CAP Industry Group Implementation Guide on the use of text-to-speech in EAS alerts. Washington State has already deployed an EAS system that employs text-to-speech, which it has found to be effective and reliable. Accordingly, WSAB advocated for allowing EAS participants to employ text-to-speech technology. As such technology is already in place and serving the public in Washington State as well as at least one other state, the WSAB believes that the technology is an effective and mature technology. The WSAB representatives also discussed the potential harm to the public and cost to Washington State if the prohibition on text-to-speech was left in place.

A copy of this notice is being submitted in the relevant dockets. Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brendan Holland", with a stylized flourish at the end.

Brendan Holland

cc: Dave Grimaldi, Esq.